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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
LAS VEGAS

MIRA KHANY,)	
)	
Plaintiff,)	Civil Docket No. 2:22-cv-01781-VCF
)	
v.)	
)	
KILOLO KIJAKAZI,)	Assigned to Judge Cam Ferenbach
Acting Commissioner Social Security,)	
)	
Defendant.)	

PLAINTIFF'S SECOND UNOPPOSEDMOTION
FOR A THIRTY (30) DAY EXTENSION TO FILE PLAINTIFF'S
MOTION FOR REMAND TO AGENCY AND MEMORANDUM IN SUPPORT

COMES NOW Plaintiff, Mira Khany, through her undersigned counsel, and moves this Court for a second extension of time of thirty (30) days to file Plaintiff's Motion for Remand to Agency and Memorandum in Support.

1. Upon review of the certified administrative transcript in this matter, the undersigned noted that there were two administrative hearings that took place in this matter. There was a hearing conducted on April 1, 2021 and a supplemental hearing on September 22, 2021 (Tr. 21, 221-245, 259-283).

2. The certified administrative transcript only includes the Transcript of Oral Hearing, dated April 1, 2021 (Tr. 141-156).

3. Thus the certified administrative transcript is incomplete as it does not contain the Transcript of Oral Hearing from the administrative hearing that took place on September 22, 2021.

1 4. The lack of the transcript of the administrative proceedings from September 22,
2 2021 may cause severe prejudice to this severely disabled plaintiff since it would result in the
3 unintended waiver of additional appellate arguments.

4 5. The undersigned promptly reported this omission to counsel for the Defendant.

5 6. The inclusion of the administrative proceedings from September 22, 2021 is also
6 crucial to the Defendant in responding to any of the Plaintiff's appellate arguments.

7 7. The case before this Court is an important one that deserves proper and complete
8 briefing by the parties. The additional time shall allow the undersigned to properly bring forth all
9 of the issues in this matter.

10 8. There is no indication that granting the Plaintiff's Motion for Extension would
11 result in any prejudice to the Defendant. In fact, counsel for SSA has indicated that they do not
12 object to Plaintiff's request for additional time.

13 WHEREFORE, Plaintiff's moves this Court for an Order granting Plaintiff an additional
14 thirty (30) days to file Plaintiff's Motion for Remand to Agency and Memorandum in Support
15 after the Defendant files the full and proper certified administrative transcript in this matter.

16 Respectfully submitted this 2nd day of May 2023,

17 By: /s/ Joshua R. Harris
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26 *Attorney for Plaintiff, Mira Khany*

CERTIFICATE OF SERVICE

I hereby certify that on **May 2, 2021**, a copy of the foregoing **Plaintiff's Motion for Extension** has been electronically filed and is available for viewing and downloading from the Electronic Case Filing system of this Court. The Social Security Administration's Office of the General Counsel and the United States Attorney's Office are registered to receive electronic service with the Electronic Case Filing system of this Court. Therefore, SSA and its counsel have been fully served and nothing further is required.

Respectfully submitted,

By: /s/ Joshua R. Harris
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MIRA KHANY,

Plaintiff,

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KILOLO KIJAKAZI,
Acting Commissioner Social Security,
Defendant.

Civil Docket No. 2:22-cv-01781-VCF

Assigned to Judge Cam Ferenbach

ORDER

Upon consideration of Plaintiff's Second Unopposed Motion for a Thirty (30) Day Extension to file Plaintiff's Motion for Remand to Agency and Memorandum in Support, it is hereby ORDERED that Plaintiff's Motion is GRANTED. Plaintiff shall file her Motion for Remand to Agency and Memorandum in Support within thirty (30) days after Defendant files a full and proper certified administrative transcript.

SO ORDERED this 3rd day of May, 2023.

BY THE COURT,



HONORABLE CAM FERENBACH
UNITED STATES JUDGE